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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al. : **08-13555 (SCC)**
:
Debtors. : **(Jointly Administered)**

x

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746
REGARDING PLAN ADMINISTRATOR'S FIVE HUNDRED TWENTY
EIGHTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

TO THE HONORABLE SHELLEY C. CHAPMAN,
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the “Case Management Order”), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan Administrator”), filed *The Plan Administrator's Five-Hundred Twenty-Eighth Omnibus Objection to Claims (No Liability Claims)* [ECF No. 58936] (the “Omnibus Objection”) with the Court on October 18, 2018.

2. In accordance with the Case Management Order, the Plan Administrator established a deadline for parties to object or file responses to the Omnibus Objection (the “Response Deadline”).

3. Pursuant to paragraph 37 of the Case Management Order, pleadings may be granted without a hearing if, among other things, no objections or other responsive documents have been filed on or prior to the applicable Response Deadline.

4. The Response Deadline passed more than 48 hours ago.

5. To the best of my knowledge, no responses to the Omnibus Objection have been filed with the Court on the docket of these cases in accordance with the Case Management Order or served on counsel to the Plan Administrator.

6. Accordingly, the Debtors and the Plan Administrator respectfully request that the proposed order granting the Omnibus Objection annexed hereto as Exhibit A, which is substantively unmodified since the filing of the Omnibus Objection, be entered in accordance with the procedures described in the Case Management Order.

Dated: November 27, 2018
New York, New York

/s/ Jacqueline Marcus
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EXHIBIT A
Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	x	

**ORDER GRANTING FIVE HUNDRED TWENTY EIGHTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the five hundred twenty eighth omnibus objection to claims, dated October 18, 2018 (the “Five Hundred Twenty Eighth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, seeking to disallow and expunge the No Liability Claims listed on Exhibit 1 annexed hereto pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], all as more fully described in the Five Hundred Twenty Eighth Omnibus Objection to Claims; and due and proper notice of the Five Hundred Twenty Eighth Omnibus Objection to Claims having been provided as stated therein, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Five Hundred Twenty Eighth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Five Hundred Twenty Eighth Omnibus

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Five Hundred Twenty Eighth Omnibus Objection to Claims.

Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Five Hundred Twenty Eighth Omnibus

Objection to Claims is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the No Liability Claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2018
New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1
No Liability Claims

IN RE: LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (SCC)

OMNIBUS OBJECTION #528: NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 BANK OF NEW YORK MELLON ON BEHALF OF SUNSET PARK CDO LIMITED SPC 2004-1	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/17/2009	15769	Contingent and Unliquidated	Contingent and Unliquidated	No Liability / Insufficient Documentation
2 BANK OF NEW YORK MELLON ON BEHALF OF SUNSET PARK CDO LIMITED SPC 2004-1	08-13555 (SCC)	Lehman Brothers Special Financing Inc	09/17/2009	15770	Contingent and Unliquidated	Contingent and Unliquidated	No Liability / Insufficient Documentation
3 BANK OF NEW YORK MELLON ON BEHALF OF SUNSET PARK CDO LIMITED SPC 2004-1	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/17/2009	15771	Contingent and Unliquidated	Contingent and Unliquidated	No Liability / Insufficient Documentation
4 BANK OF NEW YORK MELLON ON BEHALF OF SUNSET PARK CDO LIMITED SPC 2004-1	08-13555 (SCC)	Lehman Brothers Special Financing Inc.	09/17/2009	15772	Contingent and Unliquidated	Contingent and Unliquidated	No Liability / Insufficient Documentation
5 BANK OF NEW YORK MELLON ON BEHALF OF SUNSET PARK CDO LIMITED SPC 2004-1	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/17/2009	15773	Contingent and Unliquidated	Contingent and Unliquidated	No Liability / Insufficient Documentation
6 BANK OF NEW YORK MELLON ON BEHALF OF SUNSET PARK CDO LIMITED SPC 2004-1	08-13555 (SCC)	Lehman Brothers Special Financing Inc.	09/17/2009	15774	Contingent and Unliquidated	Contingent and Unliquidated	No Liability / Insufficient Documentation